

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

EARLE STANLEY GREER,
Debtor.

Bankruptcy No. 18-18146ELF
Chapter 11

ORDER

AND NOW, this day of , 2019, after hearing, the Trustee's Motion to Dismiss is Denied. Debtor is hereby allowed to continue his case as a Chapter 11 debtor.

FOR THE COURT:

Interested parties:

Hon. Eric L. Frank, B.J.

Dave P. Adams
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City of Philadelphia
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Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: :
:
EARLE STANLEY GREER, : Bankruptcy No. 18-18146ELF
: Chapter 11
Debtor. : **HEARING TO BE HELD**
: Date: December 4, 2019
: Time: 11:00 a.m.
: Place: Courtroom #1

DEBTOR'S ANSWER TO CITY OF PHILADELPHIA'S MOTION TO DISMISS OR
CONVERT TO CHAPTER 7

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Debtor answers as follows:

1. thru 3. Admitted.
4. thru 6. The Debtor is in the process of filing or has filed all defective schedules and statements.
7. and 8. Admitted.
9. thru 12. Debtor expects to pay or make arrangements to pay all outstanding post-petition arrearages by the hearing date.
13. thru 16. Admitted.
17. Debtor expects to pay or make arrangements to pay all outstanding post-petition arrearages by the hearing date.
18. The Debtor is in the process of filing or has filed all defective schedules and statements.
19. thru 22. Debtor is up to date and has agreements with all his secured creditors. Any changes in this case will wipe out Debtor and the secured creditors. The taxing authorities in Delaware county are working with him. If not for the City of Philadelphia, it's their

money and they want it now, Debtor would not need this case. He needs help with what he owes the City so that all others can be made whole.

WHEREFORE, Debtor respectfully requests that he be allowed to continue in this Bankruptcy as a Chapter 11 debtor.

Respectfully submitted,

/s/ Earle Stanley Greet

Earle Stanley Greer
Debtor

By: *Valerie A. Hibbert, Esq.*

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UNITED STATES BANKRUPTCY COURT
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In re: :
EARLE STANLEY GREER, :
Debtor. :
Bankruptcy No. 18-18146ELF
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CERTIFICATE OF SERVICE

I, Valerie A. Hibbert, Esq., do hereby certify that true and correct copies of Debtor's Answer to City of Philadelphia's Motion to Dismiss has been served this 18th day of November, 2019 by first class mail upon those listed below:

Dave P. Adams
Office of the United States Trustee
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City of Philadelphia
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